ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

Date/Time:

February 17, 2005 / 10:00 a.m.

Site Contact(s):

K-H: Karen Wiemelt, Susan Serreze

Phone:

303-692-2035 – CDPHE 303/312-6312 - EPA 303/966-4226 – DOE

Agency:

CDPHE: Harlen Ainscough, Dave Kruchek, Elizabeth Pottorff

EPA: Sam Garcia, Larry Kimmel

DOE: Norma Castañeda

Purpose of Contact: A meeting was held on February 17, 2005 to discuss the Sanitary Sewer NFAA Justification, Trench 7 NFAA Justification Addendum, and the IHSS Group 700-2 Closeout Report.

Discussion: See meeting minutes below.

Contact Record Prepared By: Susan Serreze

February 17, 2005 Comment Resolution Meetings For

Sanitary Sewer NFAA Justification Trench T-7 NFAA Justification Addendum IHSS Group 700-2 Closeout Report

A meeting was held on February 17, 2005 to discuss the Sanitary Sewer NFAA Justification, Trench 7 NFAA Justification Addendum, and the IHSS Group 700-2 Closeout Report.

Attendees

DOE: Norma Castaneda

CDPHE: Harlen Ainscough, Dave Kruchek, Elizabeth Pottorff EPA: Sam Garcia, Larry Kimmel, Todd Bechtel (Greystone)

K-H Team: Lee Norland, Karen Wiemelt, Mike Anderson, Greg Pudlik, Susan Serreze

II. Report Status

Issues

ADMIN RECORD

No Sitewide issues were discussed.

Specific Comments

Sanitary Sewer NFAA Justification

The attached written comments were received from CDPHE. The following resolutions were agreed to:

- All RCRs and the Sanitary Sewer Strategy will be attached to the NFAA Justification.
- Maps will be updated.
- DOE will check to see if lift stations were sampled.

Trench T-7 NFAA Justification Addendum

No written comments were received from EPA or CDPHE, however, the following resolutions were agreed to:

• Additional information on why Trench T-7 was addressed will be added.

IHSS Group 700-2 Closeout Report

The attached written comments were received from CDPHE and EPA. The following resolutions were agreed to:

- D&D verification sampling results do not need to be in the result tables.
- All other comments will be addressed.

Other Issues

There were no other issues for discussion.

V. Meetings

The next meeting will held on March 3 at 10:00 AM in the Breckenridge Room.





CDPHE Comments Sanitary Sewer NFAA Justification

Although we still have some concerns, based on the results to date we could agree that an NFAA seems appropriate for this system, providing that all of the agreed upon work is properly performed and any additional issues that may occur are adequately addressed.

However, some additional information needs to be included in this document. Specifically the agreed upon closure process/strategy, and all relevant documents that address the closure activities of this system, including CRs and in particular the agreement to provide the ultimate final closure documentation of this system with the Closeout Report for the WWTP.

Additional comments:

- 1) Please identify the source (buildings) of the "radioactive iodine" in Table 2.
- 2) Please update this document to provide the latest status of activities associated with this System, including updating the maps (Fig 2 & 3).
- 3) One specific concern we have is the lack of information provided to us for making final decisions regarding this System. This would include potential locations for collection of samples from appropriate lift stations. Would like to discuss!
- 4) Another issue is with the sufficiency of the number and location of the utility trench disruptions. Possibly need to consider additional locations.

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Closeout Report

IHSS Group 700-2

(UBC 707 – Plutonium Fabrication and Assembly and UBC 731 – Building 707 Process Waste)

February 2005

Specific Comments:

- 1. Executive Summary: In second paragraph, the OPWL work should be complete, or shortly, and should be referenced as such. Otherwise, there may be issues to consider before approval of this report.
- 2. Section 2.2: Reference to the IASAP is correct for the SAP addendum, but Appendix C should be referenced as being in the IABZSAP. Especially, if Appendix C was modified within the IABZSAP.
- 3. On Page 15, first and second paragraph, the 95 percent UCL protocol should be referenced to the IABZSAP.
- 4. In the fourth paragraph, or in a new paragraph, please discuss that the "B" interval of sampling location CF44-017 was not collected due to a pipe obstruction. The discussion should note that the interval 0.5-1.2 was collected at adjacent location CF44-025, that it was located along the OPWL and that all COCs were below background and/or reporting limits. Please ensure that the vertical (Z) relationship is valid between the locations.
- <u>5.</u> Also, discuss the co-location of CG43-015 and CG43-024, relative to the missing "B" interval of CG43-024.
- 6. Section 4.0: The removal of the slab should be complete by this date, please report as such. Additionally, we understand that the slab was flipped over at some locations resulting in radionuclide contamination of the surface soils. Please discuss all aspects of the resulting remediation and, as appropriate,

- confirmation sampling effort. If no remediation/confirmation sampling, please explain in all relevant sections.)
- 7. Section 4.1.2: See Comment No. 6.
- 8. Section 4.1.3: See Comment No. 1.
- 9. Section 5.0: See Comment No. 6.
- 10. Section 7.0, Screen 1: Only three subsurface arsenic values exceeded WRW and none were remediated. The "fourth" one described as having been remediated, was the surface (+3x) hotspot. Additionally, the benzo(a)pyrene WRW exceedance was a surface occurrence. Please remove the surface locations from the discussion or acknowledge as surface samples.
- 11. Screen 3: Although the sampling of the OPWL was moved to IHSS Group 000-2, it may be appropriate to acknowledge RFCA Attachment 14 as being considered in the 000-2 Closeout Report. Alternatively, note it in this document.
- 12. Screen 4: Please discuss arsenic, i.e. low residual levels.
- 13. Section 8.1: CG42-008 should be corrected to read, "0.0-0.5 ft". See Table 3, a subsurface sample would not invoke the hotspot analysis but rather the SSRS.
- 14. CG43-015: Delete reference to "arsenic 24.3 mg/kg, 0.5 to 2.5 feet". The subsurface sample does not invoke the hotspot analysis.
- 15. Section 14.2.3: Regarding the rejected metals record included in Table 22, please determine the metal and indicate, if so, that the rejection does not affect project decisions.
- **Section 15.0:** Relative to the second bullet, delete or modify the reference to benzo(a)pyrene, it was from a surface sample and not subject to the SSRS.
- 17. Appendix B: Please include the CRs dated May 10, 2004 and January 1

EPA has two comments regarding the subject document (700-2).

Page ES-2, first bullet. The concentration for benzo[a]pyrene references 2,700 ug/kg. Based on data presented in the tables and the first paragraph on this page, the concentration should reflect 3,700 ug/kg.

Page 64 is missing on the hardcopy document.

Required Distribution:		Additional Distribution:
M. Aguilar, USEPA	R. McCallister, DOE-RFFO	
S. Bell, DOE-RFFO	J. Mead, K-H ESS	_
J. Berardini, K-H	S. Nesta, K-H RISS	
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